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October 26, 2020

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

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Re: Jennifer Eckhart v. Fox News Network, LLC, Ed Henry, Sean Hannity, Tucker Carlson, and Howard Kurtz, Civil Case No. 1:20-cv-05593 (RA)

Cathy Areu v. Fox News Network, LLC, Ed Henry, Sean Hannity, Tucker Carlson, and Howard Kurtz, Civil Case No. 1:20-cv-08678 (RA)

Dear Judge Abrams:

On behalf of Fox News Network, LLC, Tucker Carlson, Sean Hannity and Howard Kurtz (the "Fox News Defendants"), we write to request a one (1) week extension of time to file a consolidated reply to Plaintiffs' briefs in opposition to the Fox News Defendants' Rule 11 motion for sanctions. (Dkt. Nos. 100, 102) The Fox News Defendants have not previously sought an extension of time regarding this motion, and counsel for Plaintiffs Eckhart and Plaintiff Areu each consent to this request in its entirety.

Under the current deadlines set by the Court, the Fox News Defendants' replies are due on Friday, October 30, 2020. The Fox News Defendants request an extension to Friday, November 6, 2020.

In addition, the Fox News Defendants respectfully request leave to file a single, consolidated twenty-five (25) page reply to the two separate opposition briefs. (Dkt. Nos. 100, 102). Under the rules, Fox would be entitled to file two separate replies of 10 pages each. But Plaintiffs obtained extra pages for their opposition briefs, which were 28 and 27 pages in length, respectively. The issues in the opposition briefs substantially overlap. In order to respond to them adequately, the Fox News Defendants request leave to file a single consolidated reply of 25 pages.

If granted, the Fox News Defendants would file the same consolidated Reply memorandum of law on both the Eckhart and Areu dockets.

Respectfully submitted,

/s/ Kathleen M. McKenna

Kathleen M. McKenna, Esq.

Proskauer»

Attorneys for Fox Defendants

cc: All counsel of record (via ECF)